

## Remarks

Claims 1, 2, and 4-22 are now pending in this application. Applicant has amended claims 1 and 5 to clarify the present invention. Applicant respectfully requests favorable reconsideration of this application.

The Examiner rejected claims 1-3 and 15-18 under 35 U.S.C. § 102(b) as being anticipated by U.S. patent 4,438,817 to Pokladnik et al. The Examiner rejected claims 5-12 under 35 U.S.C. § 102(b) as being anticipated by U.S. patent 4,174,011 to Zaremba. The Examiner rejected claims 5, 7, and 13 under 35 U.S.C. § 102(b) as being anticipated by U.S. patent 5,992,526 to Cunningham. The Examiner rejected claims 1 and 19 under 35 U.S.C. § 102(b) as being anticipated by U.S. patent 5,085,277 to Hopper. The Examiner rejected claims 4, 21, and 22 under 35 U.S.C. § 103(a) as being unpatentable over Pokladnik et al. in view of U.S. patent 6,231,265 to Rytlewski et al. The Examiner rejected claim 14 under 35 U.S.C. § 103(a) as being unpatentable over Cunningham et al. in view of U.S. patent 6,325,159 to Peterman et al. The Examiner rejected claim 20 under 35 U.S.C. § 103(a) as being unpatentable over Hopper in view of Pokladnik et al.

Pokladnik et al. does not disclose the present invention as recited in claim 1 since, among other things, Pokladnik et al. does not disclose a structure that includes an array of projections that extend generally vertically above at least one guide member, wherein the projections are operative to engage corresponding recesses arranged in a corresponding guide member by extending throughout the recesses. Rather, Pokladnik et al. appears to disclose a structure that

includes guide posts, each of which is engaged by a guide post on a Christmas tree assembly or a manifold-separator assembly. Therefore, Pokladnik et al. does not disclose the present invention as recited in claim 1 or claims 2 and 15-18, which depend from claim 1.

Zaremba does not disclose the present invention as recited in claim 5 since, among other things, Zaremba does not disclose a structure that includes projections arranged at a corresponding guide member and extending generally vertically below the corresponding guide member to be connected thereto with the projections extending throughout the recesses. Rather, Zaremba appears to disclose a structure that includes a post/pin 80 that includes laterally extending teeth 90 that engage laterally teeth 92 on carousel guidance slot 40. Therefore, Zaremba does not disclose the present invention as recited in claim 5 or claims 6-12, which depend therefrom.

Cunningham et al. does not disclose the present invention as recited in claim 5 since, among other things, Cunningham et al. does not disclose a structure that includes projections arranged at a corresponding guide member and extending generally vertically below the corresponding guide member to be connected thereto with the projections extending throughout the recesses. Rather, Cunningham et al. appears to disclose a slot 26 in which a body 30 is arranged. Therefore, Cunningham et al. does not disclose the present invention as recited in claim 5 or claims 7 and 13, which depend therefrom.

Hopper does not disclose the present invention as recited in claim 1 since, among other things, Hopper does not disclose a structure that includes an array of projections that extend

generally vertically above at least one guide member, wherein the projections are operative to engage corresponding recesses arranged in a corresponding guide member by extending throughout the recesses. Rather, Hopper appears to disclose a structure that includes stack 17, which the Examiner has identified as a guide member, and guide sleeves 27 and 28, which the Examiner identifies as projections and recesses, respectively. Therefore, Hopper does not disclose the present invention as recited in claim 1 or claim 19, which depends from claim 1.

In view of the above, none of Pokladnik et al., Zaremba, Cunningham et al., or Hopper discloses all elements of the present invention as recited in newly amended claims 1 and 5 and claims dependent thereon. Since none of Pokladnik et al., Zaremba, Cunningham et al., or Hopper discloses all elements of the present invention as recited in newly amended claims 1 and 5 and claims dependent thereon, the present invention, as recited in claims 1, 2, and 5-19, is not properly rejected under 35 U.S.C. § 102(b). For an anticipation rejection under 35 U.S.C. § 102(b) no difference may exist between the claimed invention and the reference disclosure. *See Scripps Clinic and Research Foundation v. Genentech, Inc.*, 18 U.S.P.Q. 841 (C.A.F.C. 1984).

Along these lines, anticipation requires the disclosure, in a cited reference, of each and every recitation, as set forth in the claims. *See Hodosh v. Block Drug Co.*, 229 U.S.P.Q. 182 (Fed. Cir. 1986); *Titanium Metals Corp. v. Banner*, 227 U.S.P.Q. 773 (Fed. Cir. 1985); *Orthokinetics, Inc. v. Safety Travel Chairs, Inc.*, 1 U.S.P.Q.2d 1081 (Fed. Cir. 1986); and *Akzo N.V. v. U.S. International Trade Commissioner*, 1 U.S.P.Q.2d 1081 (Fed. Cir. 1986).

Pokladnik et al. does not suggest the present invention as recited in claim 4 since, among

other things, Pokladnik et al. does not suggest a structure that includes an array of projections that extend generally vertically above at least one guide member, wherein the projections are operative to engage corresponding recesses arranged in a corresponding guide member by extending throughout the recesses. Rather, Pokladnik et al. appears to suggest a structure that includes guide posts, each of which is engaged by a guide post on a Christmas tree assembly or a manifold-separator assembly. Combining Pokladnik et al. with Rytlewski et al. does not suggest the present invention since, among other things, even if the structure suggested by Pokladnik et al. were provided with an outer layer of a low-friction material as the Examiner asserts Rytlewski et al. suggests, Pokladnik et al. would not suggest the above-discussed features of the present invention as recited in claim 4. Therefore, the combination of Pokladnik et al. and Rytlewski et al. does not suggest the present invention as recited in claim 4 and claims 21 and 22, which depend from claim 4.

Cunningham et al. does not suggest the present invention as recited in claim 14 since, among other things, Cunningham et al. does not suggest a structure that includes projections arranged at a corresponding guide member and extending generally vertically below the corresponding guide member to be connected thereto with the projections extending throughout the recesses. Rather, Cunningham et al. appears to suggest a slot 26 in which a body 30 is arranged. Combining the structure suggested by Cunningham et al. with the structure suggested by Peterman et al. does not suggest the present invention as recited in claim 14 since, the mud pump that the Examiner asserts Peterman et al. suggests would not provide the present invention with the recesses and projections as described above. Therefore, the combination of Cunningham et al. and Peterman et al. does not suggest the present invention as recited in claim

14.

Hopper does not suggest the present invention as recited in claim 20 since, among other things, Hopper does not suggest a structure that includes an array of projections that extend generally vertically above at least one guide member, wherein the projections are operative to engage corresponding recesses arranged in a corresponding guide member by extending throughout the recesses. Rather, Hopper appears to suggest a structure that includes stack 17, which the Examiner has identified as a guide member, and guide sleeves 27 and 28, which the Examiner identifies as projections and recesses, respectively. Combining the structure suggested by Hopper with the structure suggested by Pokladnik et al. would not suggest the present invention as recited in claim 20 since, among other things, Pokladnik et al. does not overcome the above-described deficiencies of Hopper. Therefore, the combination of Hopper and Pokladnik et al. does not suggest the present invention as recited in claim 20.

In view of the above, the references relied upon in the office action, whether considered alone or in combination, do not disclose or suggest patentable features of the present invention. Therefore, the references relied upon in the office action, whether considered alone or in combination, do not anticipate the present invention or make the present invention obvious. Accordingly, Applicant submits that the present invention is patentable over the cited references and respectfully requests withdrawal of the rejections based on the cited references.

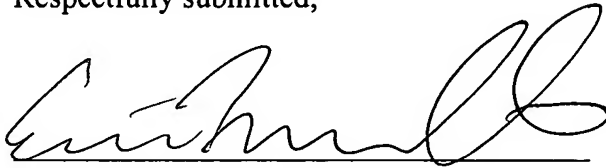
If an interview would advance the prosecution of this application, Applicant respectfully urges the Examiner to contact the undersigned at the telephone number listed below.

The undersigned authorizes the Commissioner to charge insufficient fees and credit overpayment associated with this communication to Deposit Account No. 22-0261.

Respectfully submitted,

Date:

6/29/06

A handwritten signature in black ink, appearing to read "Eric J. Franklin", written over a horizontal line.

Eric J. Franklin, Reg. No. 37,134

Attorney for Applicant

Venable LLP

575 7<sup>th</sup> Street

Washington, DC 20004

Telephone: 202-344-4936

Facsimile: 202-344-8300